



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 11, 2024

BY ECF AND EMAIL

The Honorable J. Paul Oetken
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Martin Mizrahi*, 22 Cr. 650 (JPO)

Dear Judge Oetken:

The Government respectfully submits this letter on behalf of the parties regarding a proposed schedule for post-trial motions and the sentencing of defendant Martin Mizrahi. The parties have jointly agreed to the following deadlines for Rule 29 and Rule 33 motions, which they request that the Court adopt: motions to be filed by the defendant by April 1, 2024; the Government's response to be filed by April 29, 2024; and any reply from the defendant to be filed by May 13, 2024.

The parties have not been able to reach an agreement regarding a proposed sentencing date. The Government proposes that sentencing should be scheduled for early June 2024, after the completion of post-trial briefing and approximately three months from the date of the jury's verdict.

Counsel for Mizrahi are engaged in regulatory hearings (COELIG) in the matter of former Senator Jeffrey Klein, in Albany, New York from 4/8/24 - 4/12/24 and begin pre-hearing litigation on 3/16/24. Counsel for defendant Martin Mizrahi therefore respectfully requests that the sentencing should be scheduled for the 2nd week of July 2024, approximately three months from the completion of the aforementioned hearings.

Defendant's post-trial motions are due April 1, 2024, the Government's response is due April 29, 2024, and any reply is due May 13, 2024.

Sentencing is scheduled for **Wednesday, July 10, 2024, at 11:00 a.m.**

Defendant's sentencing submission shall be filed by June 26, 2024, and the Government's sentencing submission shall be filed by July 3, 2024.

So ordered: 3/12/2024

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

/s/
Emily Deininger
Benjamin Klein
Assistant United States Attorneys
Southern District of New York
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J. PAUL OETKEN
United States District Judge